

Via U.S.P.S. Certified Mail (Original + Three Copies Included)

October 12 2015

Federal Elections Commission  
Office of the General Counsel  
999 E. Street N.W.  
Washington DC 20463

**RE: FEC Complaint Pursuant  
Moran for Kansas (FEC C00458315)  
Moran, Jerry (FEC SoKS00091)**

Dear Federal Elections Commission,

IR # 6972

The undersigned complainant ("Complainant") respectfully submits this FEC Complaint pursuant to 52 U.S.C. § 30109 and 11 C.F.R. § 111.4.

Complainant is a citizen of the United States and registered voter in the State of Kansas. The Respondent is the Honorable Jerry Moran, an incumbent United States Senator for the State of Kansas, and his respective registered campaign committee and campaign committee treasurer ("Respondent"). Respondent has an active candidacy for re-nomination and re-election in 2016. Complainant and Respondent are further described herein at Section II Parties.

Complainant requests the Federal Election Commission ("FEC" or "Commission") to initiate an inquiry and investigation into the failure of Respondent to disclose itemized report of expenditures at SCHEDULE B of the Respondent's JULY 15 2015 FEC FORM 3 QUARTERLY REPORT. SCHEDULE B was completely omitted from both electronic and hardcopy filings. The allegations of this FEC Complaint are further described herein at Section III Allegations.

#### **I. Jurisdiction**

The Commission has jurisdiction and authority for inquiry, investigation, enforcement and disposition of the foregoing FEC Complaint at 52 U.S.C. § 30109. Complainant respectfully submits the foregoing FEC Complaint pursuant to the requirements set forth at 11 C.F.R. § 111.4.

#### **II. Parties**

The respective identities of Complainant and Respondent are as follows:

Complainant	Debbie Nuss  Manhattan KS 66502	
Respondent	Moran for Kansas FEC C00458315 PO Box 1151 Hays KS 67601 Timothy Gottschalk, Treas.	Moran, Jerry FEC SoKS00091 Incumbent US Senator State of Kansas

### III. Allegations

Complainant's allegations are as follows:

1	Respondent is candidate for federal office with registered campaign committee.	52 U.S.C. §30101; 11 C.F.R. § 101.1 and 11 C.F.R. § 102.1.
2	Respondent must maintain itemized accounting of expenditures.	52 U.S.C. §30102(c); 11 C.F.R. §102.9
3	Respondent must file quarterly itemized report of expenditures.	52 U.S.C. §30104; 11 C.F.R. § 104.9
4	Respondent filed JULY 15 2015 QUARTERLY FEC FORM 3 REPORT.	1 C.F.R. § 104.5(a)
5	In said JULY 15 2015 QUARTERLY FEC FORM 3 REPORT, Respondent failed to disclose itemized report of expenditures. Such disclosure, contained at SCHEDULE B, must include amount, date, payee name/address and purpose. SCHEDULE B was completely omitted from both electronic and hardcopy filings.	11 C.F.R. § 102.9

Complainant's aforementioned allegations are based upon review of Respondent's JULY 15 2015 FEC FORM 3 QUARTERLY REPORT, as filed respectively with the FEC and Secretary of Senate. For purposes of this FEC Complaint, said filing is incorporated herein by reference.

Absent disclosure of itemized report of expenditures at SCHEDULE B, Respondent may have engaged in further prohibited use or transfer of campaign funds. As

such, Complainant respectfully requests a prompt and thorough inquiry and investigation into the matter. If, upon finding of a statutory and/or regulatory violation, Complainant requests the FEC to expeditiously initiate an enforcement action against the Respondent and to further pursue the maximum criminal and/or administrative penalties available to the Commission.

Thank you for your cooperation and assistance in this matter.

Dated this 12<sup>th</sup> day of October 2015.

Respectfully submitted,

Debbie Nuss

Manhattan KS 66502

**CERTIFICATION**

COMES NOW Debbie Nuss, and states, under penalty of perjury, that the contents of this FEC Complaint are true and accurate, to the best of her knowledge and understanding.

AFFIANT SAITH NAUGHT

*Debbie L. Nuss*

Debbie Nuss

STATE OF KANSAS }  
COUNTY OF RILEY }

On this 12 day of October, 2015, personally appeared Debbie Nuss, known to me to be the person whose name is subscribed herein.

WITNESS MY HAND AND OFFICIAL SEAL:

*Cheryl K. Smith*  
Signature of Notary Public

My commission expires:

Oct 21 2016

